

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**24 MAG 4073**

UNITED STATES OF AMERICA

v.

DONOVAN HALL,

Defendant.

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 875(c),  
2261A(2)(B), and 2

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIELLA GANIARIS, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

**COUNT ONE**

**(Threatening Interstate Communications)**

1. On or about September 4, 2024, in the Southern District of New York and elsewhere, DONOVAN HALL, the defendant, knowingly and intentionally transmitted in interstate and foreign commerce communications containing threats to injure the person of another, to wit, HALL used a cellphone to threaten to murder an individual ("Victim-1").

(Title 18, United States Code, Sections 875(c) and 2.)

**COUNT TWO**

**(Threatening Interstate Communications)**

2. On or about October 15, 2024, in the Southern District of New York and elsewhere, DONOVAN HALL, the defendant, knowingly and intentionally transmitted in interstate and foreign commerce communications containing threats to injure the person of another, to wit, HALL threatened Victim-1 and an immediate family member of Victim-1 ("Individual-1") by texting Victim-1 a photograph of a firearm and writing "I've got something for you and your inbred children," and then texting Victim-1 a second photograph of a machete along with the text: "This knife is for child molesters like [Individual-1]."

(Title 18, United States Code, Sections 875(c) and 2.)

**COUNT THREE**

**(Cyberstalking)**

3. From in or about August 2024 through in or about November 2024, in the Southern District of New York and elsewhere, DONOVAN HALL, the defendant, with the intent to kill, injure, harass, and intimidate another person, used the mail, an interactive computer service and electronic communication service and electronic communication system of interstate commerce,

and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to a person, to wit, HALL used a cellphone to harass, intimidate, and threaten Victim-1, Victim-1's wife ("Victim-2"), and an employee who worked at a hotel owned by Victim-1 ("Victim-3"), by contacting them hundreds of times and communicating threatening messages.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. As set forth in greater detail below, the U.S. Attorney's Office for the Southern District of New York, the FBI and the New York Police Department ("NYPD") are investigating a string of violent and anti-Semitic threats believed to have been made by DONOVAN HALL, the defendant. In particular, starting in or about August 2024, HALL began making threatening phone calls—many of which were anti-Semitic in nature—to the owner of a hotel ("Victim-1") located in New York, New York (the "Hotel"), to Victim-1's family members, and to staff at the Hotel. In or about October 2024, HALL escalated his threatening conduct by sending photographs of deadly weapons to Victim-1, along with threats to use those weapons to harm Victim-1 and his family.

5. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, including interviews with Victim-1, Victim-2, and Victim-3 in which I have participated, I have learned the following, among other things:

a. A family member of Victim-1—Individual-1—is a member of the Israeli Defense Force ("IDF"). Victim-1 is married to Victim-2. Victim-1 and Victim-2 currently reside in New Jersey.

b. In or around July 2024, Individual-1 posted two videos on a social media platform depicting the explosion of a structure and the firing of a gun (the "Videos"), which were filmed during his service for the IDF.

c. In or around July 2024, after Individual-1 posted the Videos, the Videos were reposted on a social media platform, along with a reference to Individual-1's familiar connections to the owner of the Hotel (*i.e.*, Victim-1). Thereafter, several threatening messages commenting on the Videos were posted by anonymous users on the Hotel's profile page on the social media platform, as well as the Hotel's website. In addition to these posts, Individual-1's personal information, including his home address, and the Hotel's contact information were posted on websites on the Internet available to the public.

d. On or about August 9, 2024, Victim-1 reported to law enforcement that since the prior day—August 8, 2024—his personal cellphone and the Hotel had received approximately 50 calls from a particular cellphone number subscribed in the name of the father of DONOVAN HALL, the defendant (the "Hall Phone").

e. Based on my review of phone records for the Hall Phone, I know, among other things, that the Hall Phone contacted Victim-1's personal cellphone, home telephone, and the Hotel approximately 54 times between August 8 and August 9, 2024.

f. On or about August 9, 2024, Victim-3 reported that on one of these calls from the Hall Phone to the Hotel, the caller threatened Victim-3, an employee of the Hotel, and stated, in substance and in part, that he was going to kill Victim-3, that he was going to travel to the Hotel on his motorcycle, and that he was going to shoot Victim-3 in the head.

g. On another one of these calls on or about August 9, 2024, the user of the Hall Phone called Victim-1's cell phone from the Hall Phone and, in substance and in part, threatened to come to Victim-1's residence in New Jersey, correctly noted Victim-1's home address, and said that he's going to shoot Victim-1 and kill him and his family.

h. Also on or about August 9, 2024, the user of the Hall Phone, called the Hotel on a recorded line (the "August 9 Call"). Based on my review of the recording, I know that HALL stated the following, among other things, to Victim-1 and Victim-3:

Hey I got your Jew daddy's address in New Jersey. You hear me, [Individual-1], I'm going to find you, you thought you were gonna hide? . . . I can hear the inbreeding in your voice, you fucking Jew bag . . . I talked to daddy today, I talked to daddy and he got scared and hung up whenever I asked for [Individual-1] . . . he blocked my phone number because he's a scared little bitch... you know how funny that is that you're going to kill children, but whenever a man says something to you, you wanna hide behind fucking women . . . I'm gonna fuck your asshole, buddy. I'm going to rip you in two . . . I'm gonna kill you. I am going to kill you. I'm going to kill you . . . I'm coming to your fucking house [recites address of Victim-1 and Victim-2's residence] . . . you're gonna see on the fucking news bitch and then I'm coming for you . . . now that I know he's in Jersey with me, it's fucking over . . . let me talk to that Jew behind you, let me talk to that child-murdering Jew behind you . . . Hey, I'm gonna kill you. You hear me... I'm going to kill you, you fucking Jew, I'm going to rip your fucking Shylock nose off and shove it up your fucking ass . . . you're about to see some Hitler shit in real fucking life . . . I'm coming to your fucking hotel and turning it into a Gaza building . . . I'm gonna burn your fucking building to the ground with you inside of it and all your Jew friends.<sup>1</sup>

i. Also on or about August 9, 2024, the user of the Hall Phone called the Hotel and stated the following, among other things, to Victim-1 and Victim-3:

- "I'm gonna take my meds and I'm gonna come shoot you in the head, okay?"
- "You're going to be laughing whenever I'm burning you alive."
- "As soon as I find you, I'm gonna pull your wallet out and I'm gonna go kill your whole fucking family."

---

<sup>1</sup> All quotations herein are based on initial transcriptions of recorded calls and are subject to change upon further review.

j. Also on or about August 9, 2024, an NYPD detective (“Detective-1”) called a number associated with HALL’s father (the “Father”)<sup>2</sup> in an attempt to confirm the user of the Hall Phone. Based on my discussions with Detective-1, and my review of his reports, I have learned, in substance and in part that, no one answered Detective-1’s call but Detective-1 left a voicemail for the Father.

k. That same day, however, Detective-1 received a phone call from the Hall Phone. During this call, HALL, in substance and in part, identified himself to Detective-1 and referenced the Video. When Detective-1 told HALL that HALL was being accused of threatening the staff of the Hotel, HALL did not deny making threatening calls to the Hotel and made multiple references to calls he had with the Hotel, stating that he (HALL) was threatened by the Hotel staff.

l. Several minutes after Detective-1’s call with HALL, Detective-1 received a telephone call from the Father. On this call, the Father confirmed that his son, HALL, was the user of the Hall Phone and that HALL had been angry about the Video. The Father also noted that other law enforcement entities had been investigating HALL stemming from similar threatening statements made by HALL.<sup>3</sup>

m. On or about September 4, 2024, HALL, using the Hall Phone, called the Hotel on a recorded line and spoke with Victim-1 (the “September 4 Call”). Based on my review of the recording, I have learned, in substance and in part, that during this call, HALL referenced receiving a call from someone identifying himself as a police officer. HALL then proceeded to make numerous anti-Semitic statements and repeatedly threatened to kill Victim-1 and Individual-1 and to blow up the Hotel. During the September 4 Call, HALL stated the following, among other things:

- “You know who needs help is [Individual-1]. He needs help shooting himself in the fucking head.”
- “Where’s [Individual-1] at so we can string his ass up?”
- “Wait till I put you back in that fucking oven . . . with my bare fucking hands, Jew.”
- “Are you gonna come outside your building so I can fuck your face up. . . walk outside you fucking queer.”
- “Psychopathic Jew, genocidal maniacs that think they can get away with whatever, I’m going to fucking slit your throat, you stupid bitch, you hear me? I’m going to take you and [Individual-1] and fucking kill you. I’m going to take your balls and I’m gonna hang you upside fucking down.”
- “How about I go ahead and get ahold of [Victim-2], huh? . . . Does that sound like fun? She’s at home right? She’s at home right? And I can just go to your house is what you’re saying, right?”
- “Where’s that pussy ass bitch [Individual-1]? I’m going to turn [Individual-1]

---

<sup>2</sup> Detective-1 called a different number subscribed to the father of DONOVAN HALL, not the Hall phone.

<sup>3</sup> As part of this investigation, the FBI has learned that starting on or about June 26, 2024, the user of the Hall Phone made similarly threatening and anti-Semitic calls to employees of a jewelry store in Astoria, New York.

into a woman.”

n. On or about September 5, 2024, HALL, using the Hall Phone, left a recorded voicemail on Victim-1 and Victim-2’s home telephone line in New Jersey (the “September 5 Voicemail”). Based on my review of the September 5 Voicemail, I have learned that during the September 5 Voicemail, HALL stated the following, among other things: “it’s [Victim-1], the inbred Jew . . . that if he ever came face to face with me, would fucking meet his demise, fucking pussy.”

o. On or about September 24, 2024, HALL, using the Hall Phone, called the Hotel on a recorded line and spoke with Victim-3 (the “September 24 Call”). Based on my review of the recording, I have learned that during the September 4 Call, HALL stated the following, among other things:

- “You think you’re fucking tough, bitch. I’m gonna fucking murder your whole fucking family once I rip your wallet out your pocket.”
- “Yeah. I’m gonna kill your daughter, for sure.”
- “Because once I see you, and once you stop breathing, I’m heading to your daughter next.”
- “I’m gonna rip your fucking heart out”

p. Between on or about August 8, 2024, and November 20, 2024, HALL, using the Hall Phone, contacted the Hotel, its owners, and its employees at least 971 times and made numerous threatening, intimidating, and anti-Semitic statements during those communications.

q. On or about October 15, 2024, HALL, using the Hall Phone, sent Victim-1 the following messages and images (“Image-1,” “Image-2,” and “Image-3”), among other things:

Image-1:

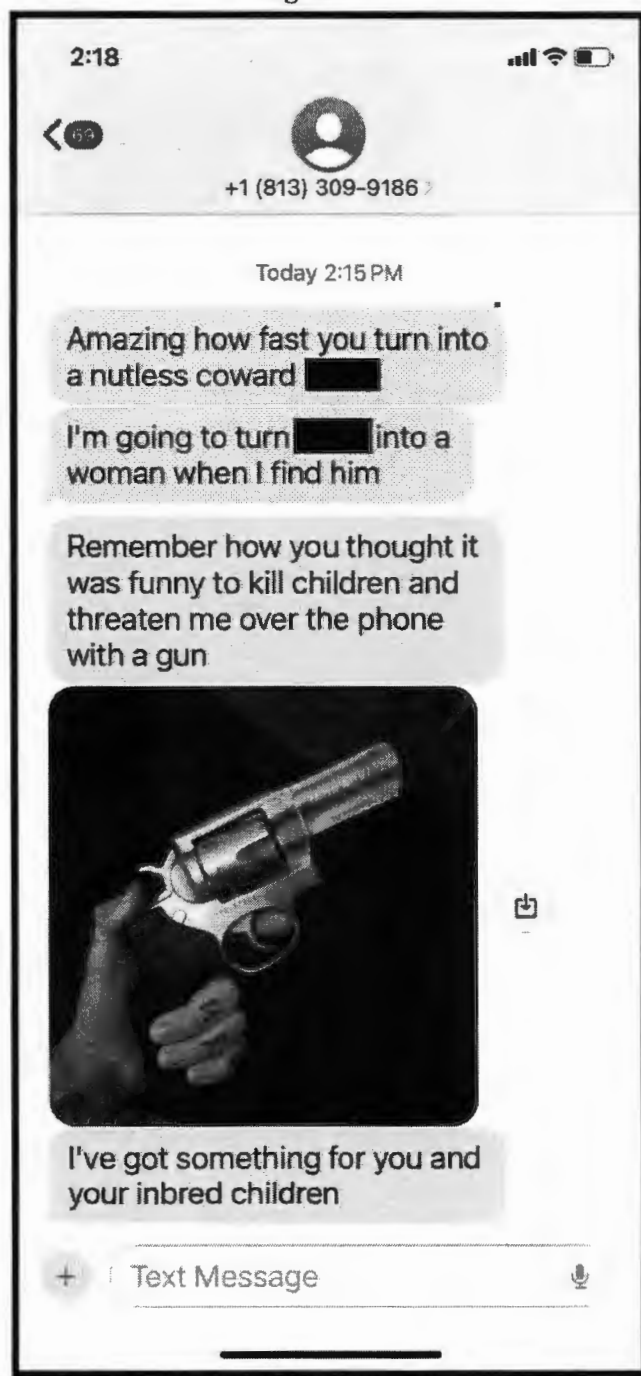


Image-2:

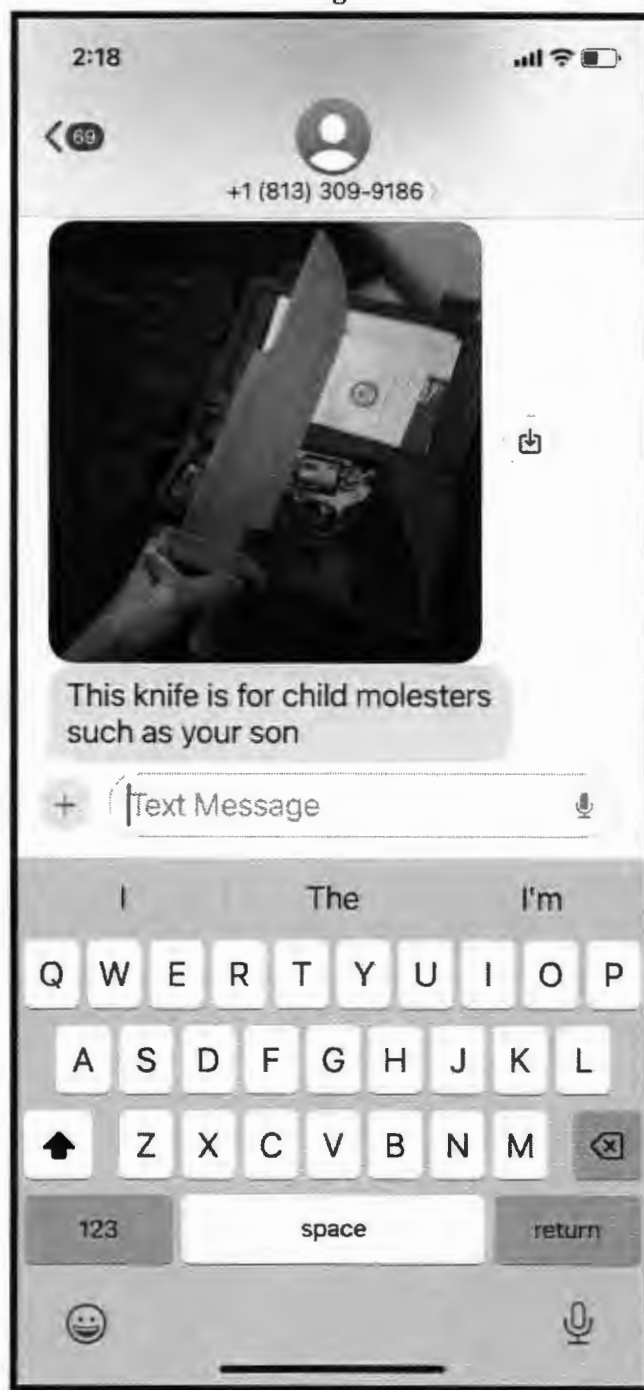
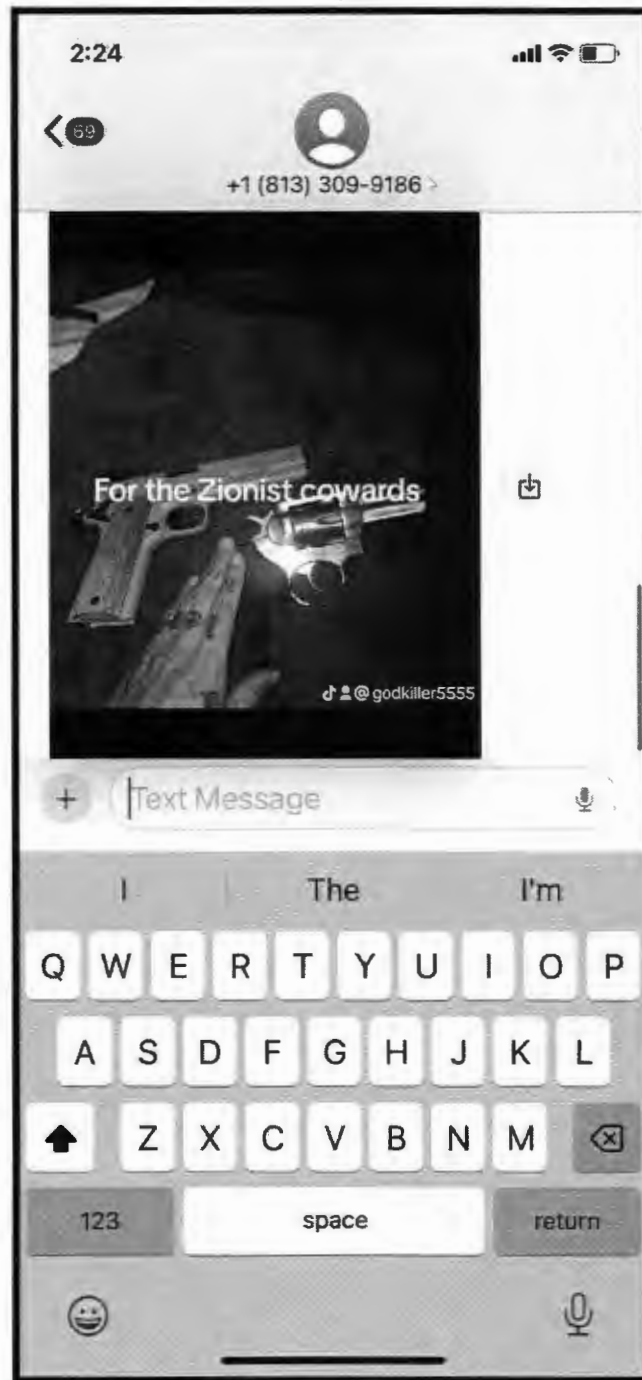


Image-3:

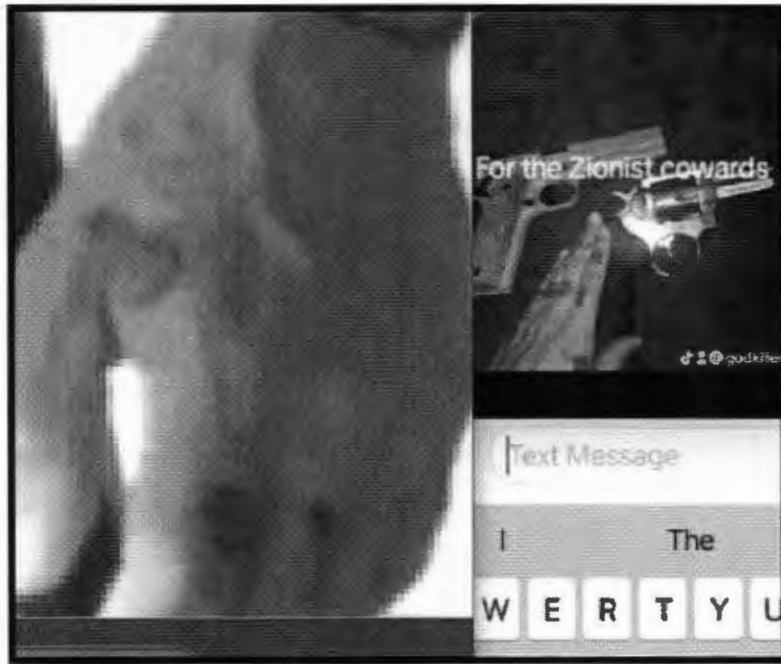




6. Based on my review of a Facebook account for "Donovan Hall," which is available to the public, I know that this is the profile picture (the "Hall Facebook Profile Picture") for the account:



7. Based on my comparison of the Hall Facebook Profile Picture and an image of DONOVAN HALL, the defendant, from a law enforcement database, I believe that the individual depicted in the Hall Facebook Profile Picture is HALL. Furthermore, and as depicted below, based on a comparison of the tattoos on HALL's left hand in the Hall Facebook Profile Picture and the tattoos of the individual depicted in Image-3, which HALL sent to Victim-1 on or about October 15, 2024, I believe that HALL's hand is depicted in the images with the firearms.



8. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 15, 2024, law enforcement agents conducted surveillance at a residential address in Arizona (the "Arizona Hall Address") and believe they identified the location of DONOVAN HALL, the defendant. In particular, the individual law enforcement identified as HALL matches an image of HALL from law enforcement databases and the image of HALL from the Hall Facebook Profile Picture. The individual identified as HALL was also driving a motorcycle whose license plate was registered in HALL's name.

9. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that the serial number on the revolver depicted in Image-2 sent by DONOVAN HALL, the defendant, to Victim-1 on or about October 15, 2024, *see supra* ¶ 5(q), is registered in the name of an individual who resides in Arizona ("Individual-2"). The registration paperwork for the revolver states that Individual-2 resides at the Arizona Hall Address—the same address where law enforcement identified HALL during its surveillance on or about October 15, 2024.

10. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about October 30, 2024, DONOVAN HALL, the defendant, used the Hall Phone to call an employee of an organization that advocates against anti-Semitism. During the call, and in subsequent voicemails sent to the employee, HALL, in substance and in part, made anti-Semitic statements and threatened that he would be seeing the employee soon.

11. Based on my review of documents and records, my conversations with other law enforcement officers, and my involvement in this investigation, I have learned that on or about November 7, 2024, DONOVAN HALL, the defendant, used the Hall Phone to send two voicemails

to an organization that supports IDF soldiers. In the first voicemail, HALL stated, "Hey, you inbreds. You need to get the fuck out of America before we find you. You gonna sit here in dual citizenship, and uh, not fight for your own country but go over and murder children? You need to get out right fucking now before we come and show up. I'll be calling back again. And then after I call again, I'm gonna show up in person." In the second voicemail, HALL stated: "I told you bitch I was gonna leave one more fucking message, and then I'm gonna show up in person. You gonna operate on American soil; you are an enemy to Americans and will be treated as such. See you soon."


WHEREFORE, I respectfully request that a warrant be issued for the arrest of DONOVAN HALL, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Daniella Ganiaris, by SDA with permission

---

DANIELLA GANIARIS  
Special Agent  
FBI

Sworn to me through the transmission of  
this Complaint by reliable electronic  
means (telephone), this 21<sup>st</sup> day of November, 2024.

---

THE HONORABLE STEWART D. AARON  
United States Magistrate Judge  
Southern District of New York